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December 16, 2003

Country-of-Origin Labeling Program
Room 2092-S
USDA – Agricultural Marketing Service (AMS)
STOP 0249
1400 Independence Avenue SW
Washington, DC 20250-0249

RE: Docket No. LS-03-04. Proposed Rule: Mandatory Country-of-Origin Labeling of Beef, Pork, Lamb, Fish, Perishable Agricultural Commodities and Peanuts. Request for Extension of Comment Period.

To Whom It May Concern:

The American Association of Meat Processors (AAMP) is requesting a 60-day extension to the comment period in regards to the above – referenced rulemaking. The American Association of Meat Processors is the largest meat trade association in the United States. Our members are meat and poultry slaughterers, processors, wholesalers, retailers, caterers, and home food service companies, as well as suppliers and consultants to the meat and poultry processing industry. Most of AAMP's members are small, very small and medium-sized businesses, many of them family – owned.

The members of AAMP will be affected by the increased regulations that would be imposed on the industry by the country-of-origin labeling requirements that are being considered by the Agricultural Marketing Service. That is because many AAMP members are suppliers of products that are “covered” and so would be directly covered by this regulation. Our members not directly covered will nevertheless be affected negatively because of the greatly increased costs that will be experienced throughout the meat industry if this rule is finalized and published.

In fact, the meat industry will be forced to carry a significant amount of the increased costs of this regulation. USDA's Economic Research Service (ERS) estimates implementation costs to be about \$2.4 billion for meat products in just the first year!

Because of the huge economic impact this proposed regulation will exert on the meat industry, the American Association of Meat Processors believes that additional time to file comments beyond the end of December is warranted. This additional time would allow AAMP and others in the industry to carefully study the impact of the rule, as well

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as think about ways to reduce the burdens that this regulation will impose on the industry.

This longer opportunity to formulate comments about this rule is especially needed when you consider the part of the proposal that meat packers who are “initiating” or “original” suppliers of a covered commodity may have to shoulder more of the responsibility regarding the accuracy of the labeling information than others in the food distribution chain.

As we indicated earlier in this letter, the proposal was formulated so that comments would be due on December 29. The original 60-day comment period in this proposed rule includes two major holiday periods. We believe the timing of the comment period in this proposal are preventing affected persons and organizations from considering the issues in the rule, as well as writing and submitting comments. And since the federal government, including USDA, is closed both December 25 and 26, there are at least four days immediately before the comment deadline when government officials will not be available to discuss issues in this proposal with the public, or to answer questions that might come up, and that could affect the comments submitted by the public.

For the above reasons, the American Association of Meat Processors respectfully asks AMS for an additional 60 days to file comments concerning this proposed regulation. If you have any questions or issues in regard to our request, please get in touch with me, and I will be happy to visit with you about it.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernard F. Shire", with a stylized flourish at the end.

Bernard F. Shire, Director
Legislative & Regulatory Affairs

cc: Hugh Tyler, AAMP President